

Tips and insights for (better) integrity communication

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PREFACE

Communicating about integrity is important but far from easy. That is why the Dutch Whistleblowers Authority sets out some insights and tips for you. This overview is primarily intended for integrity and compliance officers as support in (better) communicating about integrity within their own organisation.

To effectively promote integrity in organisations, it is important to communicate about it properly. However, integrity is not an easy or obvious topic of conversation. It is quite often seen as a vague, redundant, moralistic and difficult concept to operationalise. Therefore, it is important to clarify exactly what integrity means and how it translates into everyday actions. Integrity is encouraged through open communication and good example behaviour and is thus also non-verbal in nature. In addition, integrity is not merely an internal issue. Integrity issues can have a major social impact.

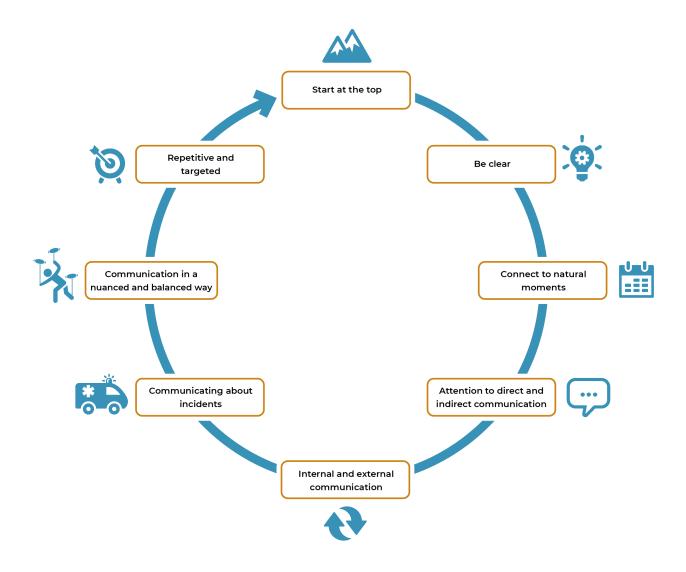
Apart from that, the outside world also attaches increasing importance to integrity and ethics in organisations. This requires organisations to think carefully about integrity promotion and how to communicate about it effectively. Below, we set out some insights and tips on communicating integrity in eight steps.

This brochure came about on the basis of conversations and interviews with communication and integrity professionals from various private and public sector organisations. Many thanks for the enthusiastic and voluntary contributions of the respondents from Rabobank, Diversity, Rotterdam municipality, Amsterdam municipality, Ministry of the Interior and Kingdom Relations, ProRail, NOC NST, VNG, AWVN, FNV, ACM, Frank Peters and Edgar Karssing.

SUMMARY

In this brochure, we provide eight tips that are important for good integrity communication. The outlines of these, you can see listed here:

- 1. Start at the top: management is an important culture carrier of the organisation. Communication on integrity therefore starts with management expressing, with commitment in word and deed, the importance of integrity
- .2. Be clear: decide in advance what you want to talk about specifically, who the target audience is and what you want to achieve with your communication.
- 3. Connect to natural moments: drawing attention to the issue of integrity in different ways and at different times helps make it part of the culture. A tip is to do this by connecting to 'natural moments' such as when employees start working, during team meetings or when employees take up a new position.
- 4. Attention to direct and indirect communication: non-verbal or indirect communication is at least as important as direct (verbal) communication. Employees' behaviour is therefore largely determined by what the organisation really values. Make sure this matches what is said in words.
- 5. Internal and external communication: communicating about integrity is not only important for the organisation's employees but also beyond. External stakeholders such as citizens and customers also attach increasing importance to the integrity of organisations and it is therefore good to communicate about it proactively.
- 6. Communicating about incidents: how to communicate during a crisis and how an incident can be a reason to re-emphasise agreements or to further strengthen the integrity approach. This brochure provides some rules of thumb.
- 7. Communicating in a nuanced and balanced way: if integrity is only discussed when things go wrong, integrity, which is essentially a positive concept, gets a negative connotation. This can result in people associating integrity purely with what it is not: violations, problems and wrongdoings and they prefer to shut themselves off from it. So it is important to communicate in a nuanced and balanced way.
- 8. Good information transfer is based on the principles of repetition and targeted communication. The trick is to repeat without people losing interest and dropping out. Make sure it stays engaging, for example by responding to current events and engaging your target audience.



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START AT THE TOP

Management is an important culture carrier of the organisation. Communication on integrity therefore starts with management. Clear commitment in word and deed that expresses the importance of integrity is indispensable. As an integrity officer, you can pass on the following points of interest to your management:

- Be aware of organisational values and standards and how you act on them;
- Be aware of the integrity risks that (may) occur in the workplace;
- Ethical leadership affects how employees behave, whether they dare to raise issues for discussion and, ultimately, whether they dare to report them;
- Be available and easily approachable by employees. Be open to signals, prepare to receive reports and handle them correctly;
- Attend ethical leadership training both individually and as a group;
- Link integrity with the other relevant themes such as diversity, social safety, internal control and information security so that these themes can reinforce each other:
- Learn from incidents. Look not only at the individual incident, but also at the broader (organisational) picture within which incidents may have occurred.

2. BE CLEAR

Integrity is a broad and multifaceted topic. Therefore, decide in advance what you specifically want to talk about, who the target audience is and what you want to achieve with your communication. Here are a few tips that can help you focus your communication on integrity:

- Too many focal points bogs down the message, so don't want to tell too much but focus on a limited number of concrete key points;
- Keep it simple, avoid fuzzy language and make it concrete by giving examples that are recognisable to the organisation;
- Be clear about what you want people to do, for example: When in doubt, contact the confidant, supervisor or integrity officer;
- Don't take things for granted, e.g. why is integrity and working with integrity important to the organisation. Don't assume this is obvious to everyone;
- Communicating (about integrity) is a profession, which is why it is good for the integrity manager to be supported by communication professionals.

3. CONNECT TO NATURAL MOMENTS

Communicating about integrity can be done in many ways and at different times. A good tip is to connect with 'natural moments'. Highlighting the issue of integrity in different ways and at different times helps make it part of the culture. Examples of such natural moments are:

- Attracting new employees. Include the importance of integrity explicitly in job advertisements.
- During the recruitment process. During the interview or selection tests, question the candidate on the subject of integrity.
- When welcoming new employees. During the induction course for new employees, explain what integrity means to the organisation and how everyone contributes to it.
- When taking the oath/promise (civil service). By saying the oath or promise and linking that to integrity, you not only bring it to mind but employees explicitly express their commitment to work with integrity and other colleagues and the organisation witness it. It is powerful if, at that moment, the organisation promises to support employees in doing so, thereby making a mutual commitment.
- During team meetings. Ask if employees encounter anything, if they have suggestions on how to do things better or if they have any questions. Also practice together by discussing an integrity dilemma.
- When employees are given a new position. With a different position, there may be other integrity issues to address. This is especially true in managerial positions where ethical leadership is part of the responsibilities. Check whether the employee is aware of these and to what extent these skills have been acquired or need to be further developed.
- Performance and exit interviews can highlight the importance of integrity. Check whether integrity issues or culture is a reason for dissatisfaction or departure.

4. FOCUS ON DIRECT AND INDERECT COMMUNICATION

When communicating about integrity, it is important that you pay attention to consistency between direct (formal) and indirect (informal) communications. Direct expressions are message sources directly aimed at communicating the importance of integrity, while indirect message sources relate to stated behaviour that may or may not be in line with it. A total of five different message-sources can be distinguished:

- the story, through which an organisation conveys in words that integrity is important;
- the organisation's integrity values, standards and aspirations;
- the organisation's integrity rules, procedures and measures;
- the actual behaviour in organisations;
- the decisions made in organisations;

The first three message sources are direct in nature, the last two are indirect. The five sources have to fit together; otherwise, your organisation will send contradictory signals and may give the impression that integrity is not always considered as important after all. For instance, employees are quick to downplay the importance the organisation attaches to integrity and the importance of integrity values and rules when they see that actual behaviour in organisations deviates from them and goes unpunished.

This also applies if the organisation sets goals or makes decisions in which integrity does not actually count. For example, if the organisation says it values integrity, but when it chooses its suppliers, it does not care to work with companies that compromise ethics and integrity. And if an organisation encourages employees to work with integrity and discuss integrity issues with each other, but at the same time imposes very tight deadlines and unrealistic targets on its employees, there will be no room to discuss these issues with each other, and there will be no time to make ethical considerations together. So the organisation then in practice values things other than integrity. Employee behaviour is therefore largely determined by what the organisation really values, and that does not always match what is said in words.

Indirect (non-verbal) communication is often more powerful than direct (verbal) messages. For example, the organisation should inform employees about the internal reporting scheme. Confidence in the proper functioning of the reporting scheme will largely depend on employees' experience of the reporting scheme. If promises are kept and people perceive that their report is taken seriously, dealt with properly and leads to visible results, this achieves more impact than simply saying that the organisation has a good reporting system.

5. INTERNAL AND EXTERNAL COMMUNICATION

Communicating about integrity is not only important for the organisation's employees but also beyond. External stakeholders such as citizens and customers also attach increasing importance to the integrity of organisations and it is therefore good to communicate about it proactively. Some tips for communicating integrity well internally and externally are:

- Make sure internal and external communications are aligned and consistent.
- Keep in mind that the line between inside and outside the organisation has become very blurred. Through social media, internal information can quickly get out, and opinions about the organisation held in the outside world can have an impact on how the organisation operates.
- Engage with both internal staff and the outside world. For example, make sure you are available and approachable for questions or suggestions from internal and external stakeholders.
- If you state what the norms and values are, also be open to reactions, feedback and possible reports. Always take that seriously and respond appropriately.
- If you draft a code of conduct, ask for input from the outside world, test it against that and share the code of conduct with the outside world.

Show what the organisation does to promote integrity and how it deals with areas of learning and improvement. For example: tell about the integrity approach in the annual report.

6. COMMUNICATING ABOUT INCIDENTS

It is always possible that things go wrong and then it is important to respond swiftly. Both by dealing with the issue properly and communicating about it well. Some rules of thumb can help when communicating about integrity incidents:

- Tell immediately what is going on: offer facts and also tell what things you do not yet know and will investigate further;
- Indicate the next steps and what you will do to avoid such incidents from happening in the future;
- Ensure empathetic communication, especially when there are aggrieved people;
- · Take time to offer facts, if it takes longer, say so;
- Stay calm and do not allow yourself to be pressurised by (social) media, for example.

Incidents can be a good opportunity to bring the agreements back into focus internally. Perhaps there is a lack of clarity about how certain agreements should be applied, in which case it is better to enter into dialogue about this.

It also provides an opportunity to talk about what happened and what was done about it. How was the incident handled and what lessons were learned? This feedback is valuable for behavioural change. It shows that it is taken seriously and it pays to discuss integrity with each other.

Incidents are often a catalyst to (more) work on integrity policy. This can provide a concrete trigger, but often the attention subsides again after the crisis has passed. It is therefore preferable to build up the integrity policy in a period when no crises are claiming all the attention, but to build it up systematically and thus avoid the risk of incidents. If you only communicate in response to an incident, that can have the effect that integrity afterwards is also only associated with violations and negative experiences.

7. COMMUNICATE IN A NUANCED AND BALANCED WAY

Integrity is a complex and sometimes fraught subject. It is therefore important to communicate in a nuanced and balanced way. If integrity is only discussed when things go wrong then integrity, which is essentially a positive concept, gets a negative connotation. As a result, when people hear about integrity they may associate it purely with violations, problems and wrongdoings and prefer to shut themselves off from it. To communicate in a nuanced and balanced way, the following suggestions may be helpful:

- Do not communicate only from what is not allowed. Do not communicate with a finger wagging, but primarily choose a constructive, positive angle.
- If integrity has nevertheless become too loaded a topic that people turn away from, it may help to put the topic in a broader perspective or focus on related themes such as ethics, good governance, professional conduct, or dealing with dilemmas.
- Of course, things can always go wrong. Complaints and reports, provide an opportunity to reflect on what can be learnt and provide an opportunity for (re)affirming existing standards or the need to re-evaluate them. For instance, if it appears that employees are not well aware of certain agreements, it can be useful to clarify that following the incident.
- If an investigation is ongoing after an incident, it can be difficult to communicate specifically about that case. Consider what can be told without unnecessarily compromising the investigation and the person(s) involved. After all, the outcome may be that nothing is wrong or that there was a misunderstanding. Choose your words carefully. Open where possible, closed where necessary might be the message.

8. REPETITIVE AND TARGETED

Good information transfer is based on the principles of repetition and audience-centred communication. The trick is to repeat without people getting tired of it and losing interest. Make sure it stays engaging, for example by responding to current events and engaging your target audience. Here are a few tips for target group-oriented and repetitive but varied communication:

- Get to know the target audiences in your organisation well and the integrity issues involved in their work. In most organisations, there is a diverse audience with different target groups. In doing so, not everyone has the same interests. As a starting point, find out what employees need to do their jobs with integrity.
- Recognisability strengthens your audience's engagement. Concrete examples capture the imagination and make employees realise that they too are affected.
- Make sure all communication is accessible and understandable to all. For example, the app containing the State's Code of Conduct Integrity was re-translated to B1 language level. A new dilemma appears in the app every week for people to think about, give their assessment and receive action advice.

 (https://apps.rijksservices.nl/ApplicationPackage/Index/75 this website is in Dutch)
- Involving people is more successful if you do not rely solely on knowledge information but know how to connect head and heart. When communication appeals to interest or emotion, it helps to get people actively involved and the information is remembered longer.
- Tell a consistent and continuous story, anchored in the organisation, rather than separate initiatives. This calls for planning periodic communication, for example using an overview or annual calendar.
- Make sure the core message comes back clearly every time, such as mentioning where employees can go with questions and reports.
- Much communication and training is aimed at new employees. For instance, integrity is discussed when introducing new employees and in e-learning modules. Besides informing new people, it is also important to involve other employees and brush up their knowledge and skills, both on existing agreements and measures and on new topics.

Pretest your communication with the target audience beforehand and make adjustments based on the feedback. Look for what works in your organisation. Also check what message employees get, both verbal and non-verbal, because the received (underlying) message, may be different from what you intended.

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